## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS

ANDREW PERRONG, individually and

on behalf of all others similarly situated,

Civil File No. 2:23-cv-00035-CM

Plaintiff,

v.

TIMESHARE HELP SOURCE, LLC, AND EDUARDO BALDERAS

Defendants.

**ENTRY OF APPEARANCE** 

Kindly enter my appearance as attorney for Plaintiff in the above-captioned matter.<sup>1</sup>

RESPECTFULLY SUBMITTED AND DATED this February 21, 2024.

/s/ Andrew Roman Perrong Andrew Roman Perrong (W.D. Tex. # 333687) Perrong Law LLC 2657 Mount Carmel Avenue Glenside, Pennsylvania 19038 Phone: 215-225-5529 (CALL-LAW)

Facsimile: 888-329-0305 a@perronglaw.com

Attorney for Plaintiff and the Class

<sup>&</sup>lt;sup>1</sup> At the time of the filing of the Motion for Voluntary Dismissal Without Prejudice, which was filed pro se by Plaintiff on August 11, 2023 at ECF No. 111, Plaintiff was not an admitted attorney licensed in the Western District of Texas. Plaintiff has since been admitted to the Western District of Texas. Plaintiff respectfully requests that he be permitted to substitute in for his previous counsel in this case, Anthony I. Paronich, who is not admitted to the Western District of Texas. Plaintiff also notes that Jeremy C. Jackson was only local counsel in Pennsylvania prior to transfer and is no longer involved in this matter. Plaintiff and Attorney Andrew Roman Perrong further respectfully requests that the Court deem this Entry of Appearance as compliance with this Court's order of February 12, 2024, at ECF No. 114, requiring Plaintiff to obtain counsel licensed in the Western District of Texas, which Plaintiff is.

## **CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case. I also certify that I mailed a copy of the foregoing to:

Eduardo Balderas P.O. Box 422003 Del Rio, TX 78842

Timeshare Help Source LLC 525 Cascade Drive Suite 104 Colorado Springs, CO 80903

February 21, 2024

/s/ Andrew Roman Perrong

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